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September 22, 2020

Sent via ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*Given the status of the
action, the application
for an adjournment is
DENIED. Counsel knew of this
date prior to being retained.*

Re: *Red Fort Capital, Inc. V. Guardhouse Productions LLC, et al.,*
19 Civ. 686 (PKC)(RWL)

SO @ 20200922

J. Smith,
USDC
9-22-20

Your Honor:

As you may be aware, our firm has recently been retained to represent the Defendants in this action. We write in request of an adjournment date for the Hearing currently scheduled for September 29, 2020.

As this Court is aware, I was just retained last week, upon sifting through the voluminous documents filed and associated with this case, I felt it would take some additional time to "get up to speed" on the prior happenings and to be properly prepared for any such hearing.

Further, your deponent in the midst of being retained and attempting to review the multiple filings and responses, did in fact have a baby two weeks ago, which has set me back slightly as I am a solo practitioner.

Interestingly, additional time will not only benefit my ability to participate in the scheduled hearing, but being given the opportunity to gain a greater understanding of this case would also allow me to engage in meaningful negotiations, therefore potentially alleviating this court of its responsibilities by attaining a settlement.

Your deponent has reached out to opposing counsel from Clifford Chance, but was told that their consent would not be granted, although reminded that it had nothing to do with any actions of my own. Thank being so, if this extension is granted, your deponent will be reaching out to opposing counsel again, in an effort to see what and where we can agree on certain aspects of the case, so that only the necessary claims, if any make it to trial

WHEREFORE, I would respectfully request 45-60 days considering the over 200 filings reflected on the Docket Sheet. So that meaningful discussions and a meaningful hearing can take place, as the last thing I would want is for this Court's time to be wasted with uncertainty.

Respectfully

/s/ Anthony C. Giordano Esq.